

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

GERALD JOHNSON et al.,

Defendant.

CRIMINAL NO. JKB-16-0363

CONSENT MOTION FOR EXTENSION OF TIME

Following a scheduling conference on May 22, 2020, the Court ordered briefing as to the scope and structure of the *Remmer* hearing ordered by the Fourth Circuit earlier this year. Pursuant to that schedule, the government's opening brief is due on November 15, 2020; the defendants' response on December 15, 2020; and the government's reply on January 15, 2021. The hearing itself is scheduled for one week beginning on May 10, 2021.

With the consent of defense counsel, the government respectfully requests a 30-day extension of all briefing deadlines in this case. Undersigned counsel are handling two recently-indicted (and time-consuming) racketeering cases, *United States v. Trayvon Hall et al.*, CCB-19-561 (ETG Crips), and *United States v. Darren Parker et al.*, GLR-20-0350 (CDF Corruption), and would appreciate an extra month to prepare a thorough and well-researched brief. Even with the requested extension, briefing would be complete by February 15, 2021, approximately three months before the hearing is scheduled to begin.

We thank the Court for its consideration of this joint request. A proposed order follows.

Respectfully submitted,

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By: _____/s/
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ORDER

Upon consideration of the Consent Motion for Extension of Time and for the reasons set forth therein, it is this _____ day of October 2020, **ORDERED** that the Motion is Granted. Briefs regarding the scope and structure of the currently scheduled *Remmer* hearing shall be submitted on or before the following dates:

- Government's Opening Brief: December 15, 2020
- Defendants' Response Briefs: January 15, 2021
- Government's Reply Brief: February 15, 2021

The Honorable James K. Bredar
United States District Judge